

Attorney Docket No. P12194

REMARKS/ARGUMENTS**Claim Rejections – 35 U.S.C. § 103(a)**

In paragraphs 4-5 of the Office Action, the Examiner rejected claims 11, 14 and 16-17 under 35 U.S.C. § 103(a) as being unpatentable over Schutte, et al. (US 6,178,455) in view of Eikeland (US 5,828,837). The Applicant previously argued that Schutte did not disclose dynamically adjusting the size of the block of IP addresses. This argument overcame the previous rejection (based on Schutte alone), but the Examiner has now cited Eikeland for showing this feature. However, Eikeland only seems to disclose reducing the flow of data packets when there are indications that the network is getting congested. This is accomplished by dynamically adjusting the size of a send-window. (Col. 6, lines 22-30).

However, Eikeland does not specifically discuss sending blocks of IP addresses, and does not teach or suggest the balancing performed by the claimed invention between minimizing load on the network while ensuring that a sufficient number of IP addresses are distributed to serve all requests. The Applicant notes that independent claims 11, 16, and 17 expressly recite, "the size of the *blocks of IP-addresses* in the internal pool of each application processor is dynamically adjusted to minimize the amount of traffic required to request and distribute IP-addresses between the global processor and the application processors *while ensuring that a sufficient number of blocks is available to serve all requests for additional IP-addresses.*" (Emphasis added). This balancing feature is not taught or suggested by Schutte and Eikeland. Therefore, the allowance of independent claims 11, 16, and 17 and dependent claim 14 is respectfully requested.

In paragraph 11 of the Office Action, the Examiner rejected claims 12-13 under 35 U.S.C. § 103(a) as being unpatentable over Schutte and Eikeland in view of Wang, et al. (US 6,496,511). Wang is cited for allegedly showing a means to release the IP-address by predefining a customized function. However, the Applicant contends that the combination of Schutte, Eikeland, and Wang still does not establish a *prima facie* case of obviousness with respect to claims 12-13 because the combination does not teach or suggest all the claim limitations. In particular, the combination does not teach

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or suggest the balancing performed by the claimed invention between minimizing load on the network while ensuring that a sufficient number of IP addresses are distributed to serve all requests. Claims 12-13 depend from claim 11 and recite further limitations in combination with the novel elements of claim 11. Therefore, the allowance of claims 12-13 is respectfully requested.

In paragraph 16 of the Office Action, the Examiner rejected claim 15 under 35 U.S.C. § 103(a) as being unpatentable over Schutte and Eikeland in view of Antic, et al. (US 5,561,854). Antic is cited for allegedly showing a method of making back-up copies of the home location register on a persistent storage medium with regular intervals. However, the Applicant contends that the combination of Schutte, Eikeland, and Anitc still does not establish a *prima facie* case of obviousness with respect to claim 15 because the combination does not teach or suggest all the claim limitations. In particular, the combination does not teach or suggest the balancing performed by the claimed invention between minimizing load on the network while ensuring that a sufficient number of IP addresses are distributed to serve all requests. Claim 15 depends from claim 11 and recites further limitations in combination with the novel elements of claim 11. Therefore, the allowance of claim 15 is respectfully requested.

CONCLUSION

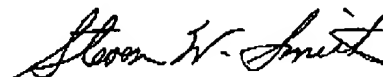
In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for claims 11-17.

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The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



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